

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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NURO FERATOVIC,

Plaintiff,

Plaintiff's Motion for Leave
to file an Amended
Complaint
CASE NO.: 24 CV 4186

- against -

NEPTUNE MAINTENANCE CORP., a
New York Corporation,
Albert "Doe" and Khalil "Doe"
Individually

Defendant.

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PLAINTIFF'S MOTION FOR LEAVE TO AMEND THE COMPLAINT

Plaintiff hereby moves this Court for leave to file the attached Amended Complaint Pursuant to Federal Rule of Civil Procedure 15 and Local Rule 15.1.

For the reasons set forth below and in the attached Memorandum of Law, Plaintiff respectfully requests this Court grant it leave to file the Amended Complaint adding the last names to the Defendants originally named as Albert "Doe" and Khalil "Doe" and adding a second Corporate Defendant. In addition to adding a cause of action for retaliatory discharge under the FLSA because the added action arises out of the same actions and will not cause any prejudice to the Defendants.

The reason for these changes is that Plaintiff did not learn the name of the individual defendants until after the filing of the original Complaint and did not learn the name of the second corporate defendant until after the mediation.

Date: April 17, 2025

Respectfully Submitted,

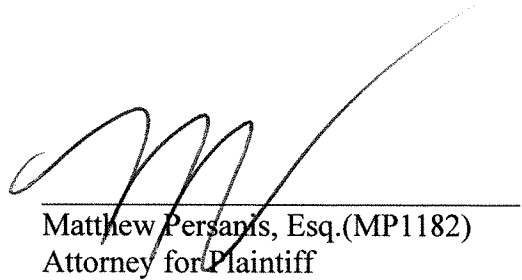

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Certification of Service

I certify that on the date set forth below the forgoing **PLAINTIFF'S MOTION FOR LEAVE TO FILE AN AMENDED COMPLAINT** was filed electronically and is available for viewing and downloading on the Court's CM/ECF system by the parties.

I further certify that on the date set forth below, the same document was served on all Defendants by first class mail on their attorneys, Joseph Labuda, Esq., Milman, Labuda, Law Group PLLC, 3000 Marcus Ave. Suite 3W8, Lake Success, NY 11042

Dated: April 7, 2025



Matthew Persanis, Esq. (MP1182)
Attorney for Plaintiff